

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
NORTHERN DIVISION

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CONSTRUCTION LABORERS PENSION TRUST	:	
FOR SOUTHERN CALIFORNIA,	:	No. 21-cv-11528
	:	
Plaintiff,	:	Honorable Thomas L. Ludington
	:	District Judge
v.	:	
	:	
ROCKET COMPANIES, INC., JAY D. FARNER,	:	Honorable Anthony P. Patti
DANIEL GILBERT and ROCK HOLDINGS INC.,	:	Magistrate Judge
	:	
Defendants.	:	
	:	
_____	X	

STIPULATION

Named Plaintiff Construction Laborers Pension Trust for Southern California (“Plaintiff”) and Defendants Rocket Companies, Inc., Rock Holdings Inc. (“RHI”), Jay D. Farner, and Daniel Gilbert (collectively, “Defendants,” and together with Plaintiff, the “Parties”), hereby stipulate and agree as follows:

WHEREAS, on February 5, 2024, Defendants filed a motion for a protective order (ECF No. 108, the “Motion for a Protective Order”) related to requests for admission that had been served on Defendants in this matter (the “RFAs”);

WHEREAS, on September 30, 2024, the Court denied the motion for class certification (ECF No. 227) that Plaintiff and former plaintiff Carl Shupe had filed on February 12, 2024 (ECF No. 111);

WHEREAS, on October 15, 2024, Plaintiff filed a Motion for Leave to File a Renewed Motion for Class Certification, or in the Alternative, Limited Motion for Reconsideration of the Court's Order Denying Class Certification of the Insider Trading Class (ECF No. 229) ("Motion for Leave");

WHEREAS, on December 2, 2024, the Court granted a stipulation between the Parties as to the ongoing case schedule, withdrawal of certain pending motions, and dismissal of former-plaintiff Carl Shupe's claims (ECF No. 234), and in granting that stipulation the Court ordered that the Parties either (a) submit supplemental briefing on the Motion for a Protective Order, or (b) file a joint stipulation and proposed order withdrawing the Motion for a Protective Order;

WHEREAS, the Parties have met and conferred and agree that resolution of the Motion for a Protective Order is not necessary at this time, because (a) the resolution of the Motion for Leave may moot the issues raised by the Motion for a Protective Order; and (b) Plaintiff believes it would be appropriate to substantially narrow the requests for admission, in light of the narrowed scope of the case Plaintiff is pursuing via the Motion for Leave;

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and among the Parties hereto and subject to approval by the Court:

1. The RFAs at issue in the Motion for a Protective Order are withdrawn.

2. Following a decision on the Motion for Leave, Plaintiff may, if necessary, serve requests for admission on Defendants that are narrower in scope than the RFAs at issue in the Motion for a Protective Order, including through removing requests that are no longer relevant in light of the claims remaining in the case.

3. The Motion for a Protective Order (ECF No. 108) is withdrawn without prejudice to Defendants serving responses and objections and/or filing a motion for a protective order in response to any further requests for admission served by Plaintiff in this Action.

IT IS SO STIPULATED.

DATED: December 13, 2024 Respectfully submitted,

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DATED: December 13, 2024

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